

Missouri  
Department of  
Natural Resources

RECREATIONAL USE ATTAINABILITY ANALYSES  
PUBLIC COMMENTS

Public Comment Period  
May 21, 2008 – August 31, 2008

**Tributary to Little Beaver Creek  
WBID #1530**

Class C  
Phelps County

Missouri Department of Natural Resources  
Water Protection Program  
PO Box 176  
Jefferson City, MO 65102-0176  
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WATER PROTECTION PROGRAM

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August 9, 2008

Mr. Rob Morrison  
Chief, Water Pollution Control Branch  
Missouri Department of Natural Resources  
P.O. Box 176  
Jefferson City, Missouri 65102

cc: UAA Coordinator  
Water Pollution Control Program

Dear Mr. Morrison:

I read with great interest your letter to the editor of the Rolla Daily News (printed July 26-27, 2008) regarding the proposed recreational use attainability analysis (UAA) for the tributary to Little Beaver Creek and subsequent comments on Little Beaver Creek southwest of Rolla in Phelps County, Missouri. You may wish to verify a statement you made regarding the location of the termination of the Tributary to Little Beaver Creek. It is my belief that the termination is not below Gollahan Spring which is more than a mile below the true termination with Little Beaver Creek between I-44 and Martin Spring Drive in the vicinity of the Moose Lodge. I concur with the UAA assessment for this tributary.

My wife, Linda, and I have owned land adjacent to Little Beaver Creek on both sides of County Road 7000 since 1970. Since that time we have witnessed major degradation of the water quality in Little Beaver Creek due in large part to the lack of action on the part of MDNR and the apathy or financial interests of the City of Rolla. One of the worst acts contributing to this water quality degradation was perpetrated by MDNR and the City of Rolla in allowing Parker Ready Mix to construct a sand and gravel crushing operation just south of the Rolla Southwest Wastewater Treatment facility on the east bank of Little Beaver Creek without providing for adequate protection of the creek from the runoff and wash water from this operation. The holding basin for the wash water was inadequate to prevent overflows and frequent wash water releases to the creek. This resulted in quantities of suspended and settleable solids being released to the creek which destroyed the previous healthy and diverse aquatic population.

On the night when a city council meeting was held to hear and vote on Parkers proposal to construct the sand and gravel operation I was in St. Louis teaching a graduate student course in Environmental Engineering. My wife attended the council meeting and presented a letter I had prepared detailing my objections to the operation as proposed. The motion to accept the proposal from Parker passed with only one councilman suggesting that the vote be delayed until the council had personally reviewed the site and made their own assessment of the potential risks. The nearest downstream landowner was not at the meeting as he was employed by Parker to oversee the construction and operation of the sand and gravel processing operation.

Following the initiation of operations the water quality degradation became readily apparent as increased turbidity and settleable solids destroyed the previously healthy and diverse aquatic life. Fish were killed or migrated elsewhere and benthic (bottom dwelling) organisms were buried or suffocated under the load of settled solids.

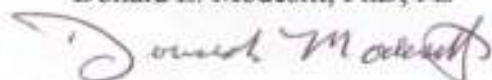
I requested an on site inspection to be performed by MDNR to assess the impact of the operation and see the adverse conditions on the stream water quality. The response I received was totally unsatisfactory in that the investigator stated that no violations were observed to occur as the facility had a detention basin to retain the solids from the wash water. The physical evidence was apparent from the deposition of stream bed solids that this detention basin was ineffective or was being bypassed. I could observe high turbidity in the stream downstream from the plant with great frequency. To my knowledge no following investigations were performed.

The point of my writing to you is an attempt to prevent further water quality degradation and the hope that in time some improvement will occur in the quantity and diversity of aquatic life. Continual monitoring of the discharges to the creek including that from the Rolla Southwest Wastewater Treatment facility must be performed and water quality standards enforced. Further publicity regarding this section of Little Beaver Creek as acceptable for whole body recreation is likely to increase the incidences of trespassing, trash disposal and individuals releasing body wastes on our property or in the creek.

Please respond to me at the address on the letterhead with a copy to my Rolla address: 14940 CO RD. 7100, Rolla, MO 65401.

Sincere regards and best wishes for your continuing career.

Donald E. Modesitt, PhD, PE

A handwritten signature in dark ink, appearing to read "Donald E. Modesitt", written in a cursive style.